

**THE ROSEN LAW FIRM, P.A.**

Phillip Kim, Esq. (PK 9384)  
Laurence M. Rosen, Esq. (LR 5733)  
275 Madison Avenue, 34<sup>th</sup> Floor  
New York, New York 10016  
Telephone: (212) 686-1060  
Fax: (212) 202-3827  
Email: pkim@rosenlegal.com  
Email: lrosen@rosenlegal.com

*[Proposed] Lead Counsel for Lead Plaintiff and Class*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MARIO EPELBAUM, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

DYNAGAS LNG PARTNERS LP,  
DYNAGAS GP, LLC, DYNAGAS  
HOLDING LTD., TONY LAURITZEN,  
MICHAEL GREGOS and GEORGE J.  
PROKOPIOU,

Defendants.

**CASE No.: 1:19-CV-04512-AJN**

**NOTICE OF MOTION OF MIHAI  
FELESCU TO APPOINT LEAD  
PLAINTIFF AND APPROVE LEAD  
PLAINTIFF'S SELECTION OF  
COUNSEL**

**CLASS ACTION**

**PLEASE TAKE NOTICE** that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Plaintiff Mihai Felescu ("Movant") hereby moves this Court, the Honorable Alison J. Nathan, United States District Court Judge, on a date and at a time to be designated by the Court, for an order:

- (a) appointing Movant to serve as Lead Plaintiff in this action; and

(b) approving Movant's selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated July 16, 2019 (and exhibits); and (ii) a [Proposed] Order Appointing Lead Plaintiff and Approving Lead Plaintiff's Selection of Counsel.

Dated: July 16, 2019

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim  
Phillip Kim, Esq. (PK 9384)  
Laurence M. Rosen, Esq. (LR 5733)  
275 Madison Avenue, 34<sup>th</sup> Floor  
New York, New York 10016  
Telephone: (212) 686-1060  
Fax: (212) 202-3827  
Email: pkim@rosenlegal.com  
Email: lrosen@rosenlegal.com

*[Proposed] Lead Counsel for Lead Plaintiff  
and Class*

**THE SCHALL LAW FIRM**

Brian Schall, Esq.  
1880 Century Park East, Suite 404  
Los Angeles, CA 90067  
Telephone: (424) 303-1964  
Email: brian@schallfirm.com

*Additional Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2019, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim